

<b>State of Michigan</b> <b>54-A Judicial District</b>	<b>AFFIDAVIT OF PROBABLE CAUSE</b>	<b>Case No:</b> <b>District:</b>
---	--	-------------------------------------

**Charge:** False Report of Terrorism x2, False Bomb T **Date of Offense:** 12/12/2020 & 01/07/2021

**Complaint No.:** 16-3-21

**Location of Offense:** By phone to the Capitol

**Police Agency:** Michigan State Police - Capitol

**City:** Lansing

**Defendant Name:** Michael Chad Varrone

**Felony** ☒ **Misdemeanor** ☐

**Date of Birth:** [REDACTED]

**Custody** ☒ **Non-Custody** ☐

**Race:** white **Gender:** male **Height:** 5' 9" **Weight:** 185 **Hair:** brown **Eye:** blue

**THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:**

On December 12, 2020 at 10:26am, the accused, MICHAEL CHAD VARRONE, telephoned Michigan Representative Thomas Albert's legislative office and left a threatening voicemail message using his cellular phone with number [REDACTED]. The accused stated, "If there is one more threat by a democratic person in Michigan that's supposed to represent me, I will personally come down there and take over that goddam building at the Capitol" He further stated, "If I'm threatened by another Senator or anybody like Cynthia Johnson, I'll personally take care of that motherfucker and their whole fucking family, there'll be no Johnsons left in Michigan." The accused stated his name was Mike Varrone and spelled his last name.

On January 7, 2021 at 6:44am, the accused, MICHAEL CHAD VARRONE, telephoned the State Capitol from his cellular phone number [REDACTED] and spoke with Legislative Services Bureau Central Control Operator [REDACTED]. The accused asked, "Is this the State Capitol?" [REDACTED] confirmed he called the Capitol. The accused then stated, "Everyone better get out of the building because it'll fucking explode" and immediately hung up.

I interviewed the accused on January 7, 2021 and he admitted [REDACTED] is his cellular phone number and nobody else uses or has access to his cell phone. He admitted to leaving the aforementioned voicemail message to Representative Albert in mid-December 2020. He was upset with public statements Michigan Representative Cynthia Johnson made. The accused admitted that he is upset with the current political climate and what occurred at the United States Capitol the previous day. The accused did not recall telephoning the Capitol on January 7, 2021 at 6:44am and stated he sometimes does not recall conversations and events when he first awakens in the morning.

Legislative Services Bureau provided phone records showing the number [REDACTED] called Representative Albertson's office and Central Control at the corresponding dates/times of the voicemail threat and bomb threat to the State Capitol.

*W.L. 1-8-2021*

"Do you declare that the statements contained in this Affidavit of Probable Cause and the attached Complaint are true to the best of your information, knowledge, and belief?"

Officer Response: "I Do" ☒

(Check Box)

Reviewed on: 01/08/2021  
Date

W. Luebs 1-8-21  
Officer: D/Sgt. William Luebs Badge #: 160  
Contact #: 517-927-6667

Subscribed and Sworn before me on: 01/08/2021  
Date

\_\_\_\_\_  
**Honorable** Chen A. Wilson 61471  
Judge/Magistrate — \_\_\_\_\_ District Court

STATE OF MICHIGAN 54A JUDICIAL DISTRICT 30L JUDICIAL CIRCUIT	<b>COMPLAINT FELONY</b>	DISTRICT: CIRCUIT: CTN: 96-21900005-01 MSP #:
--	-----------------------------	--

District Court ORI: MI330075J

Circuit Court ORI: MI330055J

AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN v MICHAEL CHAD VARRONE [REDACTED] CHARLOTTE, MI 48813 Co-defendant(s)			Victim or complainant: STATE OF MICHIGAN
City/Twp./Village City of Lansing			Complaining Witness D/SGT. WILLIAM LUEBS- MSP
County in Michigan Ingham			Date: On or about 12/12/2020 - 1/7/2021
Defendant SID			Defendant DOB [REDACTED]
Charge(s) See Below			Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF INGHAM

The complaining witness says that on the date range above and in the City of Lansing, the defendant, contrary to law,

**COUNT 1: FALSE REPORT OR THREAT OF TERRORISM**

did knowingly make a false report of an act of terrorism and did communicate the false report to another person; contrary to MCL 750.543m. [750.543M]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

**COUNT 2: FALSE REPORT OR THREAT OF TERRORISM**

did knowingly make a false report of an act of terrorism and did communicate the false report to another person; contrary to MCL 750.543m. [750.543M]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

**COUNT 3: FALSE REPORT OR THREAT OF BOMB/HARMFUL DEVICE**

did knowingly make a false report of a violation or attempted violation of MCL 750.328 and communicate or cause the communication of the false report to another person, knowing the report to be false; contrary to MCL 750.411a(3)(a). [750.411A3A]

FELONY: 4 Years and/or \$2,000.00; costs to government for responding to false report (see MCL 750.411a(4))

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>01/07/2021</u>	<i>William Lebr</i> <i>W. Lebr #160 1-8-2021</i>
by: <i>Danielle Hagaman-Clark</i>	Complaining witness signature
Danielle Hagaman-Clark (P63017) Division Chief Criminal Trials & Appeals Division 525 W. Ottawa St., 7th Floor Lansing, MI 48933 517-335-7650	Subscribed and sworn to before me on <u>01/08/2021</u>
<input type="checkbox"/> Security for costs posted	Judge/Magistrate/Clerk <i>Chen Q. Wilson P61471</i> Bar no.



STATE OF MICHIGAN 54A JUDICIAL DISTRICT 30L JUDICIAL CIRCUIT	<b>WARRANT FELONY</b>	DISTRICT: CIRCUIT: CTN: 96-21900005-01 MSP #:
District Court ORI: MI330075J	Circuit Court ORI: MI330055J	AG ORI: MI820025A

**THE PEOPLE OF THE STATE OF MICHIGAN**

**v**

**MICHAEL CHAD VARRONE**  
[REDACTED]  
**CHARLOTTE, MI 48813**

Victim or complainant:

STATE OF MICHIGAN

Complaining Witness  
D/SGT. WILLIAM LUEBS- MSP

Height: 5'9"	Weight: 185	Hair Color: BRO	Eye Color: BLU	Race: White	Sex: M	Date: On or about 12/12/2020 - 1/7/2021
City/Twp./Village City of Lansing		County in Michigan INGHAM	Defendant SID			Defendant DOB [REDACTED]
Charge(s) See Below						Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF INGHAM

To any peace officer or court officer authorized to make arrest: The complaining witness has filed a sworn complaint in this court stating:

**COUNT 1: FALSE REPORT OR THREAT OF TERRORISM**

did knowingly make a false report of an act of terrorism and did communicate the false report to another person; contrary to MCL 750.543m. [750.543M]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

**COUNT 2: FALSE REPORT OR THREAT OF TERRORISM**

did knowingly make a false report of an act of terrorism and did communicate the false report to another person; contrary to MCL 750.543m. [750.543M]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

**COUNT 3: FALSE REPORT OR THREAT OF BOMB/HARMFUL DEVICE**

did knowingly make a false report of a violation or attempted violation of MCL 750.328 and communicate or cause the communication of the false report to another person, knowing the report to be false; contrary to MCL 750.411a(3)(a). [750.411A3A]

FELONY: 4 Years and/or \$2,000.00; costs to government for responding to false report (see MCL 750.411a(4))

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

Upon examination of the complaining witness, I find that the offense(s) charged has/have been committed and that there is probable cause to believe that defendant committed the offense(s). THEREFORE, IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN, I order you to arrest and bring defendant before the 54A District Court immediately.

The defendant may be released before arraignment if \$ IN CUSTODY is posted as interim bail

by \_\_\_\_\_  
Date

01/08/2021

Date

(SEAL)

Judge/Magistrate

Chen Q Wilson P61471

Bar no.

RETURN

As ordered in this warrant, the defendant was arrested on \_\_\_\_\_ at \_\_\_\_\_  
Date Time  
at \_\_\_\_\_  
Place of arrest

\_\_\_\_\_  
Date

\_\_\_\_\_  
Peace officer

PROSECUTION TO BE HANDLED BY:

Danielle Hagaman-Clark (P63017)  
Division Chief  
Criminal Trials & Appeals Division  
525 W. Ottawa St., 7th Floor  
Lansing, MI 48933  
517-335-7650

STATE OF MICHIGAN  
54A JUDICIAL DISTRICT  
30L JUDICIAL CIRCUIT

**ADULT  
BINDER**

DISTRICT:  
CIRCUIT:  
CTN: 96-21900005-01  
MSP #:

District Court ORI: MI330075J

Circuit Court ORI: MI330055J

AG ORI: MI820025A

**THE PEOPLE OF THE STATE OF MICHIGAN**

**v**

**MICHAEL CHAD VARRONE**  
[REDACTED]  
**CHARLOTTE, MI 48813**

Victim or complainant:

STATE OF MICHIGAN

Complaining Witness

D/SGT. WILLIAM LUEBS- MSP

Co-defendant(s)

Date: On or about

12/12/2020 - 1/7/2021

City/Twp./Village  
City of Lansing

County in Michigan  
INGHAM

Defendant SID

Defendant DOB

Charge(s)  
See Below

Maximum Penalty  
See Below

Date: \_\_\_\_\_

District Judge: \_\_\_\_\_

Bar no.

Reporter/Recorder

Cert. no.

Represented by counsel

Bar no.

**EXAMINATION WAIVER**

1. I, the defendant, understand:

- a. I have a right to employ an attorney.
- b. I may request a court appointed attorney if I am financially unable to employ one.
- c. I have a right to a preliminary examination where it must be shown that a crime was committed and probable cause exists to charge me with the crime.

2. I voluntarily waive my right to a preliminary examination and understand that I will be bound over to circuit court on the charges in the complaint and warrant (or as amended).

Defendant attorney

Bar no.

Defendant

**ADULT BIND OVER**

☐ 3. Examination has been waived.

☐ 4. Examination was held and it was found that probable cause exists to believe both that an offense not cognizable by the district court has been committed and that the defendant committed the offense.

☐ 5. The defendant is bound over to circuit court to appear on \_\_\_\_\_ at \_\_\_\_\_ m.

Date

Time

☐ on the charge(s) in the complaint.

☐ on the amended charge(s) of \_\_\_\_\_

MCL/PACC Code \_\_\_\_\_

6. Bond is set in the amount of \$\_\_\_\_\_. Type of bond: \_\_\_\_\_

☐ Posted

Date

Judge

Bar no.

STATE OF MICHIGAN 54A JUDICIAL DISTRICT 30L JUDICIAL CIRCUIT		<b>INFORMATION FELONY</b>		DISTRICT: CIRCUIT: CTN: 96-21900005-01 MSP #:	
District Court ORI: MI330075J		Circuit Court ORI: MI330055J		AG ORI: MI820025A	
<b>THE PEOPLE OF THE STATE OF MICHIGAN</b>  <b>v</b>  <b>MICHAEL CHAD VARRONE</b> <b>CHARLOTTE, MI 48813</b>				Victim or complainant:	
				STATE OF MICHIGAN	
				Complaining Witness D/SGT. WILLIAM LUEBS- MSP	
Co-defendant(s)				Date: On or about 12/12/2020 - 1/7/2021	
City/Twp./Village City of Lansing	County in Michigan INGHAM	Defendant SID		Defendant DOB	
Charge(s) See Below				Maximum Penalty See Below	

STATE OF MICHIGAN, COUNTY OF INGHAM  
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Dana Nessel, Attorney General for the State of Michigan, appears before the court and informs the court that on the date range above and in the City of Lansing, the defendant:

**COUNT 1: FALSE REPORT OR THREAT OF TERRORISM**

did knowingly make a false report of an act of terrorism and did communicate the false report to another person; contrary to MCL 750.543m. [750.543M]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

**COUNT 2: FALSE REPORT OR THREAT OF TERRORISM**

did knowingly make a false report of an act of terrorism and did communicate the false report to another person; contrary to MCL 750.543m. [750.543M]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

**COUNT 3: FALSE REPORT OR THREAT OF BOMB/HARMFUL DEVICE**

did knowingly make a false report of a violation or attempted violation of MCL 750.328 and communicate or cause the communication of the false report to another person, knowing the report to be false; contrary to MCL 750.411a(3)(a). [750.411A3A]

FELONY: 4 Years and/or \$2,000.00; costs to government for responding to false report (see MCL 750.411a(4))



Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

and against the peace and dignity of the State of Michigan.

---

Date

---

Danielle Hagaman-Clark (P63017)  
Division Chief  
Criminal Trials & Appeals Division  
525 W. Ottawa St., 7th Floor  
Lansing, MI 48933  
517-335-7650

2021900005

STATE OF MICHIGAN  
54A DISTRICT COURT  
30L JUDICIAL CIRCUIT

**MITTIMUS  
FELONY**

CASE NO: 2021900005

The People of the State of Michigan

vs

Michael Chad Varrone 96-21900005-01

## Offense Information

Date of Offense 12/12/2020 - 1/7/2021		Police Agency / Report No. 00AG	
SEX M	RACE W	DOB 6/2/1972	SID X219000051

Defendant(s)

**Charge(s)**  
750/543M 01  
750/543M 01  
750/411A3A 01

Type of offense

## BOND HISTORY

Defendant Alias(s):

HOLDS:

☐ Felony☐ Misdem.Date  
SetDate  
Posted

Type

Amount

CAUTIONS:

Scheduled court appearances:

(SEAL)

DATE	TIME	COURT LOCATION

**To the Sheriff or Custodial Agency:** You are directed to hold the above named Defendant(s) in your care and custody until further order of the Court, or until such time as bail bond or personal recognizance is posted. When the Defendant is in your custody, you are to bring the Defendant to all hearings and Court appearances, or otherwise as directed by the Court.

Date

Judge/Magistrate

Bar no.